

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x

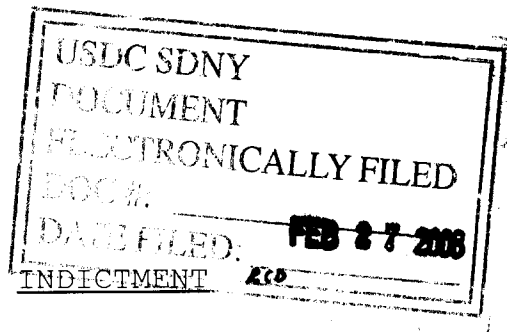
UNITED STATES OF AMERICA

- v. -

JACOB NATANOV,

Defendant.

----- x



08 Cr. ____

08 CRIM 162

COUNT ONE

The Grand Jury charges:

1. From in or about March 2006 through in or about June 2007, in the Southern District of New York and elsewhere, JACCB NATANOV, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i) of Title 18, United States Code.

2. It was a part and an object of the conspiracy that JACOB NATANOV, the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity,

with the intent to promote the carrying on of unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) & 1956(a)(1)(B)(I).

The Means And Methods Of The Conspiracy

3. Among the means and methods by which JACOB NATANOV, the defendant, and others known and unknown, would and did carry out the conspiracy were the following:

a. Members of the conspiracy created a fraudulent scheme in which elderly victims were informed by telephone that they had won a cash prize, but were told that they needed pay certain fees in order to claim the prize. However, in actuality, no prize or money award was ever sent to any of the victims after payment of thousands of dollars of supposed fees.

b. In furtherance of this fraudulent scheme, members of the conspiracy contacted victims by telephone and instructed them to send thousands of dollars of United States currency by Federal Express to certain addresses.

c. NATANOV received Federal Express packages containing United States currency at two different businesses that NATANOV owned and operated.

d. NATANOV also instructed others to accept Federal Express packages containing United States currency on his behalf.

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATION

4. As a result of committing the money laundering offense, in violation of 18 U.S.C. § 1956(a)(1)(A)(i) and (a)(1)(B)(i), alleged in Count One of this Indictment, JACOB NATANOV, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 982, all property, real and personal, involved in the money laundering offenses and all property traceable to such property, including but not limited to the following:

a. A sum of money equal to \$500,000 in United States currency, in that such sum in aggregate is property which was involved in the money laundering offenses or is traceable to such property.

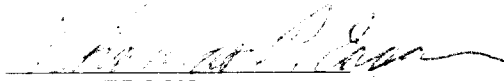
Substitute Asset Provision

b. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant --

- i. cannot be located upon the exercise of due diligence;
 - ii. has been transferred or sold to, or deposited with, a third person;
 - iii. has been placed beyond the jurisdiction of the Court;
 - iv. has been substantially diminished in value;
- or

v. has been commingled with other property which cannot be subdivided without difficulty;
it is the intention of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982 and 1956.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JACOB NATANOV,

Defendant.

INDICTMENT

(Title 18, United States Code,
Sections 1956(h))

MICHAEL J. GARCIA

United States Attorney.

A TRUE BILL

Thomas P. Lopez

Foreperson.

2/27/08 Filed indictment
Assigned to Judge Patterson
of Mag Judge Katz